

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR / SYNTHETIC MINOR (DRAFT PERMIT) No. F-05-018

ROCORE THERMAL SYSTEMS, LLC

BURKESVILLE, KY.

DECEMBER 5, 2005

MARK LABHART, REVIEWER

SOURCE I.D. # 021-057-00012

SOURCE A.I. # 37795

ACTIVITY # APE20040001

**SOURCE DESCRIPTION:**

Rocore Thermal Systems produces transmission oil coolers. The manufacturing process consists of a number of machining operations, welding, brazing, cleaning metal parts and surface coating. The fabrication process is responsible for a small amount of emissions and the cleaning / painting operations produce the bulk of emissions. The facility is potentially major for HAP and VOC, but they have elected to accept Federally Enforceable emission limitations.

**COMMENTS:**

- Regulation 401 KAR 59:010, New process operations is applicable.
- Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances is applicable.
- Regulation 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations *is not applicable*, since emissions with the Conditional Major limitations will be below major source thresholds and the source is located in a county designated attainment for ozone.
- Regulation 401 KAR 59:185, New solvent metal cleaning equipment *is not applicable*, since emissions with the Conditional Major limitations will be below major source thresholds and the source is located in a county designated attainment for ozone.
- One spray booth uses a water curtain for particulate controls. The remaining booths use dry filters. Ninety (90) percent efficiency was assumed for all cases.
- VOC and HAP emissions were calculated from material balances.
- HAP emissions modeled with SCREEN3. All predicted concentrations were below the EPA's Prioritized Dose Response Values, (PDRVs).

**EMISSION AND OPERATING CAPS DESCRIPTION:**

Rocore Thermal Systems, LLC has requested voluntary permit limits of less than 9.0 tons per year of individual hazardous air pollutants (HAP), less than 22.5 tons per year of combined HAPs, and less than 90 tons per year of VOC.

**PERIODIC MONITORING:**

Rocore Thermal Systems shall report VOC and HAP emissions semiannually.

**OPERATIONAL FLEXIBILITY:**

The source is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.